

EXHIBIT 21

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SERGEY MAYOROV,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

No. 13 CV 5249

Judge Rebecca R. Pallmeyer

AFFIDAVIT OF SERGEY MAYOROV

I, Sergey Mayorov, do hereby swear, affirm, and attest as follows, based upon my personal knowledge of the matters contained herein:

1. On December 27, 2010, I plead guilty to a charge of residential burglary plead with the understanding that I was eligible and would be placed in the Illinois "impact incarceration" program, a 120-day boot camp program, which, if I completed, would result in my release from custody without having to serve any imposed prison sentence.

2. I was sentenced to the minimum four-year sentence with a designation for boot camp.

3. During my processing at Stateville Correctional Center, I informed the ICE officers present that day, who I have come to know were Officers Mayra Reynoso and Jennifer Wall, that I was a United States citizen.

4. I was admitted to boot camp on January 25, 2011.

5. On March 18, 2011, I was handcuffed and transferred to the Vienna Correctional Center where I was held for approximately two weeks in a 24-hour lockdown

segregation before being transferred to the Shawnee Correctional Center to start serving the alternative four year prison sentence.

6. That same day, I was able to leave a voicemail for my mother giving her the telephone number for Immigration and Customs Enforcement ("ICE") (708-449-2495) that was included on the immigration detainer against me.

7. On October 10, 2011, I wrote a letter to the National Immigrant Justice Center for assistance with the immigration detainer because I was a U.S. citizen.

8. After the detainer was cancelled, I was reinstated to boot camp on or around February 6, 2012 and credited for the 52 days I had completed between January and March 2011.

9. I completed the remaining 68 days of boot camp on April 14, 2012 and was released.

10. Had the detainer not been issued, I would have completed the boot camp and been released from custody on May 25, 2011.

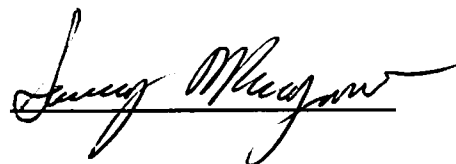
11. I endured wrongful imprisonment for 325 days as a result of the issuance of the detainer.

12. I was unable to procure employment or earn wages for 325 days as a result of the issuance of the detainer.

13. I suffered significant emotional distress and depression while imprisoned as a result of the issuance of the detainer.

I declare under penalty of perjury, and pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on: August 16, 2014

A handwritten signature in black ink, appearing to read "Sunny McQueen", written over a horizontal line.